

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

IN RE:)	In Proceedings
)	Under Chapter 13
Lionell Romeo Martin, Sr.,)	
aka Lionell Martin)	
)	Case No. 18-18105
Debtor(s).)	Honorable Judge Hunt

OBJECTION TO CONFIRMATION OF PLAN

NOW COMES Capital One Auto Finance, a division of Capital One, N.A., by and through its undersigned attorney, on its Objection to Confirmation of Plan, and in support thereof states as follows:

1. Capital One Auto Finance, a division of Capital One, N.A., has a security interest in one 2006 Ford Truck Expedition-V8 Utility 4D XLT 4WD, VIN 1FMPU16566LA00969, which was perfected by recording its lien on title.
2. Capital One Auto Finance, a division of Capital One, N.A., alleges the value set forth in Debtor's Chapter 13 Plan is unacceptable. Debtor proposes a "cramdown" pursuant to 11 U.S.C. § 506 and alleges the value of the collateral is \$1,602.00.
3. Capital One Auto Finance, a division of Capital One, N.A., alleges the value of said vehicle is \$6,225.00 pursuant to a N.A.D.A. valuation.
4. Capital One Auto Finance, a division of Capital One, N.A. alleges the vehicle is over-secured and requests the petition balance of \$5,859.84.
5. Capital One Auto Finance, a division of Capital One, N.A., alleges the proposed set monthly payment is too low to pay the secured claim during the plan term.

6. Capital One Auto Finance, a division of Capital One, N.A., alleges the proposed interest rate of 5.50% is insufficient and requests a minimum of 6.00% interest.

WHEREFORE, Capital One Auto Finance, a division of Capital One, N.A., respectfully requests this Court for entry of an Order denying confirmation and for such other and further relief as the Court deems just.

Respectfully submitted,

/s/ Jennifer M. Rinn

Rinn Richman Law LLC
PO Box 465
Chicago, IL 60690
Ph: 586-899-5086

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

IN RE:)	In Proceedings
)	Under Chapter 13
Lionell Romeo Martin, Sr.,)	
<i>aka</i> Lionell Martin)	
)	Case No. 18-18105
Debtor(s).)	Honorable Judge Hunt

**NOTICE OF OBJECTION TO CONFIRMATION OF PLAN
AND CERTIFICATE OF SERVICE**

*AN OBJECTION TO CONFIRMATION OF PLAN HAS BEEN FILED.

Please be advised that the attached objection to confirmation of plan shall be presented on September 17, 2018 at 10:30 am before the Honorable Judge Hunt at 219 South Dearborn, Courtroom 719, Chicago, Illinois 60604, pursuant to the notice generated by the court on September 14, 2018, to the following parties:

Marilyn O Marshall
224 South Michigan Ste 800
Chicago, IL 60604

The objection was further served by depositing a printed copy into the US Mail on September 14, 2018, with postage prepaid at the address listed on the creditor matrix, upon the following parties, others not served:

Lionell Romeo Martin, Sr
14536 Murray
Dolton, IL 60419

/s/ Jennifer M. Rinn
Rinn Richman Law LLC
PO Box 465
Chicago, IL 60690
Ph: 586-899-5086